

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri**FILED**

NOV 1 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

In the Matter of the Search of
USPS Priority Mail parcel **9505 5161 8462 2299**
5106 97 was addressed to "zaereyen Gregory 2493
soundview ct Florissant, MO 63031" and addressed
from: "Alex Gregory 234 s Figueroa st Los
Angeles, CA 90012"

Case No. 4:22 MJ 5253 NAB

Signed and Submitted to the Court for
filing by reliable electronic means**FILED UNDER SEAL****APPLICATION FOR A SEARCH WARRANT**

I, Bryan Bussen, a federal law enforcement officer or an attorney for the government request
a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

USPS Priority Mail parcel **9505 5161 8462 2299 5106 97** was addressed to "zaereyen Gregory 2493 soundview
ct Florissant, MO 63031" and addressed from: "Alex Gregory 234 s Figueroa st Los Angeles, CA 90012"

located in the EASTERN District of MISSOURI, there is now concealed

Controlled Substances and/or United States Currency

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

Title 21, U.S.C., §§ 846, 841(a)(1)

Conspiracy to possess with intent to distribute controlled
substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is
requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

I state under penalty of perjury that the forgoing is true and correct


Bryan Bussen

USPIS Task Force Officer

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal
Procedure 4.1 and 41

Date: November 1, 2022
Judge's signatureCity and State: St. Louis, MOHonorable Nannette A. Baker, U.S. Magistrate Judge

Printed name and title

AUSA Nathan Chapman

AFFIDAVIT

I, Bryan J. Bussen, being duly sworn, state the following:

1. I am a Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS). I have been assigned as a Task Force Officer with USPIS for approximately two years. I have been assigned to the Contraband Interdiction and Investigation (CI2) Team. I have completed available training by the USPIS in the investigation of controlled substances or proceeds/payments being transported through the United States. The St. Louis Field Office's CI2 Team has intercepted numerous parcels which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity. Prior to my assignment with the USPIS, I have accrued approximately 13 years of law enforcement experience. During my career, I have conducted numerous narcotics investigations as a Narcotics Detective with the Florissant Police Department. A position in which I have approximately 2 years of experience. While assigned as a Detective, I received extensive training in narcotics investigations.

2. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail - two day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business, correspondence. Intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an individual to an individual. Express Mail and Priority Mail are seldom used for individual to individual correspondence.

3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of Federal Express and United Parcel Service are similar to U.S. Postal Service Express Mail and Priority Mail. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service are favored because of the speed, reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service were originally intended for urgent, business-to-business, correspondence. However, intelligence from prior packages which were found to contain controlled substances or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. Federal Express and United Parcel Service are seldom utilized to convey individual-to-individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight or two to

three day delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of, and destinations for, controlled substances. The USPIS conducted an analysis of prior packages mailed through overnight and/or two to three day delivery services that contained controlled substances or proceeds/payments of controlled substance sales. The analysis of those prior packages indicated that these labels are usually from an individual to an individual. In the few cases when overnight, and or two to three day delivery service packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company, or the business listed is not associated with the mailer and was randomly selected by the mailer to deter law enforcement detection. In such instances, Postal Inspectors review available business records to verify the postage payment utilized by the mailer.

5. Most business mailings sent via USPS or through other private couriers reflect a pre-established postage meter or other various lines of credit to pay for the postage. Additionally, during the Silk Road investigation (dark web investigation that provided avenues to customers to order narcotics via the internet) the USPIS learned that unknown persons posted intelligence on the Silk Road website warning would be drug mailers that most USPIS search warrant affidavits for narcotics/narcotics proceeds packages, reflect mailing labels written as person-to-person and bore fictitious addressee and sender names. Due to the posting on the Silk Road Website, USPIS has noticed an increased number of packages utilizing valid sender and addressee names and or valid business names on narcotics/narcotics proceeds packages. Recent analysis has also shown that whether the mailer utilized a legitimate name/business on a mailing label or a fictitious name on the mailing label, cash payment for postage is the method of payment for most narcotics/narcotics proceeds parcels. USPIS analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U.S. Postal Service Express Mail, U.S. Postal Service Priority Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: package mailed from or addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed from an individual to an individual; packages are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address, and or any other characteristic previously noted in this paragraph.

6. The U.S. Postal Inspection Service St. Louis Field Office's CI2 Team has found the

characteristics listed in paragraphs three, four, and five, are indicative of packages, which have been found to contain illegal controlled substances or the proceeds/payments for controlled substances.

7. This affidavit is submitted for the limited purpose of establishing probable cause for the search warrant sought. I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are facts sufficient for the present purpose. The information contained in this affidavit is based upon my personal knowledge and investigation, as well as information conveyed to me by other law enforcement agents and employees.

8. On October 27, 2022, I was conducting a review of USPS business records, specifically inbound Priority Mail parcels to the St. Louis metropolitan area. During that review, I identified USPS Priority Mail parcel **9505 5161 8462 2299 5106 97**, hereafter known as **Subject Parcel**, which was mailed to 2493 Soundview Court, Florissant, MO 63031 from the Los Angeles, California 90071 Post Office on October 26, 2022.

9. On October 29, 2022, I responded to the St Louis USPS National Distribution Center in Hazelwood, Missouri and located the **Subject Parcel** for further review.

10. The **Subject Parcel** bore a hand-written label, was addressed from a source narcotics area: the State of California (my training and experience has shown the State of California to be a source area for narcotics), was addressed to person to person, and the postage and fees were paid in cash: \$22.45. The **Subject Parcel** was addressed to: “zaereyen Gregory 2493 soundview ct Florissant, MO 63031” and addressed from: “Alex Gregory 234 s Figueroa st Los Angeles, CA 90012”. A review of available USPS, law enforcement, and open-source databases determined 2493 Soundview Court, Florissant, MO 63031 was a valid mailing address recognized by the USPS and the name “Zaereyen Gregory” associated with the address. A review of available USPS, law enforcement, and open-source databases determined 234 S Figueroa St., Los Angeles, CA 90012 was a valid mailing address; however, the address is a multi-unit apartment complex with individual unit numbers. Although the individual unit number was not listed on the **Subject Parcel** label, I was unable to associate the name Alex Gregory to the physical address. Based on my training and experience, your affiant knows narcotic traffickers have utilized fictitious sender information on parcels to avoid detection from law enforcement.

10. I maintained custody of the Subject Parcel pending examination of the parcel by a narcotic-trained canine based upon the outlined characteristics which are consistent with parcels in the past that have contained controlled substances and/or U.S. currency as the payment for such items.

11. On October 29, 2022, I transported the **Subject Parcel** to the Florissant, Missouri Police Department. While at this location, I met with Florissant Police Officer Christopher Daub who was accompanied his narcotics certified canine “Huk.” The **Subject Parcel** was placed in an area not known to have been previously contaminated by narcotic odor. Officer Daub directed “Huk” to search the area.

Upon arriving at the **Subject Parcel**, canine "Huk" reacted with an obvious change in behavior, and Officer Daub stated that "Huk" reacted in a positive manner, indicating the presence of a narcotic odor.

11. The **Subject Parcel** is a USPS Priority Mail white cardboard box which measures approximately 12 inches, by 12 inches, by 5 ½ inches (12" x 12" x 5") and weighs approximately three (3) pounds. Based on my training and experience, as well as the training and experience of other members of the USPIS Saint Louis CI2 Team, I know that the size and weight of the **Subject Parcel**, coupled with other indicators (i.e; handwritten label; postage fees paid in cash; addressed person to person; fictitious sender name; addressed from a known source narcotics area; and a positive reaction by a narcotic trained canine), are indicative of other packages which have been found in the past to contain narcotic substances, or monies which are the proceeds/payments of narcotic trafficking. Consequently, I believe the parcel contains contraband and/or evidence in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Sections 1952, 1956, and 1957.

12. The **Subject Parcel** is currently in the custody of Task Force Officer Bryan Bussen in the Eastern District of Missouri. Attached herewith is a picture of the mailing label for USPS Priority Mail parcel 9505 5161 8462 2299 5106 97 and a copy of the qualifications for canine "Huk."

13. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public, Inspectors request that this affidavit be sealed until further order of the Court.

I state under penalty of perjury that the foregoing is true and correct.


Bryan Bussen
USPIS Task Force Officer

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this ____ day of November, 2022.

NANNETTE A. BAKER
United States Magistrate Judge
Eastern District of Missouri

Florissant Police Department
Bureau of Field Operations
Canine Probable Cause Affidavit of Qualifications
Handler: Officer Daub, DSN 632
Canine "Huk"

I, Officer Christopher Daub, DSN 632, have been a Commissioned Police Officer with the Florissant Police Department since September of 2018. I have completed 960 hours of Missouri P.O.S.T. required Law Enforcement Academy requirements. Canine "Huk" and I are currently assigned to the Florissant Police Department Bureau of Field Operations.

Canine Huk is a Brindle colored, male, Dutch Shepherd. He was born November 11, 2020. Canine Huk and I attended and completed training from February, 2022 through April 7, 2022. This course was held at Boone County Sheriff Department in Boone County Missouri. The training course consisted of eight weeks of instruction in the application of canine obedience, narcotics/controlled substance detection, article search and apprehension. Canine Huk and I were certified by the North American Police Work Dog Association (NAPWDA) and Missouri Police Canine Association.

Canine Huk has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, and MDMA. Canine Huk alerts to these odors in a passive manner and exhibits a significant change in behavior by sitting, standing, or laying at, or as close as he can get to, the source of the odor.

Since Canine Huk and I began working, he has been responsible for the seizure of heroin, ecstasy, meth and cocaine.

Canine Huk and I train a minimum of 16 hours per month, in the areas of narcotic detection, obedience, tracking, article searches and apprehension with the Boone County Sheriff Department, certified trainers, other canine programs, and/or on our own time.

This affidavit is current as of June 9, 2022.

Officer Daub, Christopher DSN 632
Bureau of Field Operations
Florissant Police Department
1700 North Highway 67
Florissant, MO 63033
314-831-7000



**PRIORITY[®]
MAIL**

PRIORITY MAIL
LARGE FLAT RATE
POSTAGE REQUIRED

**PRIORITY[®]
MAIL**



FROM: Alex Gregory
234 S Figueroa St
Los Angeles, CA 90012

TO: Zaereyen Gregory
2493 Soundview Ct
Florissant, Mo 63031

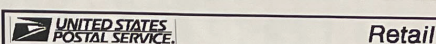
Label 228, March 2016

FOR DOMESTIC AND INTERNATIONAL USE



PS00011000002

LFRB June 2020
ID: 12 x 12 x 5 1/2
OD: 12 1/4 x 12 1/4 x 6
ODCUFT: 0.521



P

US POSTAGE PAID

\$22.45

Origin: 90071
10/28/22
0545170030-10

OM[®]
LINE

PRIORITY MAIL[®]

2 Lb 15.90 Oz

1004

EXPECTED DELIVERY DAY: 10/29/22

C074

SHIP
TO:



2493 SOUNDVIEW CT
FLORISSANT MO 63031-5643

USPS TRACKING[®] #



9505 5161 8482 2299 5108 97

BOX
IAL USE

To schedule free
Package Pickup,
scan the QR code.



USPS.COM/PICKUP